

Sheep Protein-Free Certification Program for Poultry

I. General

The Sheep Protein-Free Certification (SPFC) Program is a voluntary, user-fee service available to poultry producers and processors to provide third-party verification that poultry and poultry products have never been fed sheep protein, sheep fats, or sheep by-products. This instruction provides policies and procedures for providing service under the SPFC program.

SPFC services are provided by the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), Poultry Programs, Grading Branch under the authority of the Agricultural Marketing Act of 1946, as amended, and the Code of Federal Regulations (CFR) 7, Part 70, in cooperation with the Food Safety Inspection Service (FSIS).

II. Scope

These policies and procedures apply to the auditing and approval of production facilities, ranches, farms, slaughter and/or processing facilities, hereafter referred to as *suppliers*, and any other entity requesting poultry or poultry products to be certified under this program.

III. Program Requirements

A. General

To be eligible for the SPFC program:

- Poultry must not be fed any sheep protein, fats, or by-products at any time during their life cycle.
- Poultry must be segregated at all times from other poultry that is fed sheep protein, fats, or by-products.
- Poultry that is being processed must be segregated at all times from poultry being processed that was fed sheep protein, fats, or by-products.
- All persons responsible for program administration must have a complete understanding of the program requirements.

Poultry is defined as any kind of domesticated bird, including, but not being limited to, chickens, turkeys, ducks, geese, pigeons and guineas.

B. Documented Program

All operating procedures addressing controls to assure that only SPF poultry and poultry products are produced must be documented. These procedures must include receiving, flock identification, feeding regime, transfer of poultry to slaughter establishments, segregation and control during processing, shipping, training and record keeping. The program must be signed and dated by a responsible representative of the company.

Relevant portions of the document must be readily available for reference by persons supporting the system.

C. Requirements for Production Facilities

1. Identification and traceability
 - a. Documented procedures for identification, segregation and proper handling of feed and poultry throughout the entire production process to facilitate trace back must be maintained.
 - b. SPF poultry must be traceable to origin from any point of production.
2. Feeds and Feeding
 - a. Sources
 1. A complete list of feed ingredient sources, including rendering facilities, shall be documented in order to determine compliance with the program.
 - a. Feed mills must operate according to current Food and Drug Administration (FDA) Good Manufacturing Practices (GMP's).
 - b. Feed and ingredient sources, other than the producer's own, must be audited to determine that feed ingredients meet program requirements.
 - i. Rendering facilities must have documented procedures for identification, segregation and proper handling of rendered sheep carcasses that are processed into feed ingredients.
 - ii. Documentation must outline procedures that assure sheep protein ingredients are not commingled with SPF ingredients.
 1. Records shall indicate the source of feed ingredients.
 2. Records shall indicate feed ingredients are in compliance with the program.
 3. Testing
 - a. Feed obtained from sources that use sheep protein, fats, or by-products in the manufacturing process shall be tested to ensure feed used in the production of SPF poultry is in compliance with this program.
3. Controls and Segregation
 - a. Procedures shall be developed and documented to assure SPF feed and poultry is not commingled with non-SPF feed and poultry.
 - b. Non-SPF poultry must be adequately segregated from SPF poultry when both types of poultry are grown in the same vicinity.
 - c. Procedures shall be documented to ensure feeds with sheep protein, fats or by-products do not commingle with SPF poultry feeds. Such procedures shall meet the guidelines set forth in the FDA GMP's for feed manufacturers.

- d. Procedures shall be documented to account for poultry excluded from the SPF program.
- e. Controls will assure that SPF poultry is adequately segregated from non-SPF poultry at each stage of shipping.
- f. Procedures for the control of SPF poultry during final shipment will be documented.

4. Records

- a. The supplier shall document procedures for assuring all SPF program requirements are met prior to transfer of ownership.
- b. Procedures for documenting the results verifications of inspections and tests shall be developed and documented.
- c. Records demonstrating compliance with the SPF program shall be maintained. Records may be electronic or hard copy.
- d. Records shall be maintained for 1 year after the close of the fiscal/calendar year in which they were created.
- e. Records must be stored in a manner so as to prevent loss, damage or alteration.
- f. Records must be made readily available to auditors.

5. Training Program

- a. All employees involved in the production, processing and production of SPF poultry must be knowledgeable of the requirements of this program, including but not limited to poultry identification, segregation and feeding procedures. The educational programs shall include:
 - 1. A systematic review of procedures with all employees.
 - 2. Access to documented company procedures.
 - 3. Record of communication of any changes to the program.
 - 4. Records of training.

6. Internal Audits

- a. An internal assessment of the performance of the operation will be conducted for every phase of the process periodically.
- b. The results of internal audits will be documented.

D. Requirements for Slaughter and Processing Facilities

1. Identification and traceability

- a. Documented procedures for identification, segregation and proper handling of poultry and poultry products throughout the entire process to facilitate trace back must be maintained.
- b. SPF poultry and poultry products must be traceable to origin from any point of production or processing.

2. Processing controls
 - a. Each step in the process where controls are needed to assure that only SPF poultry are slaughtered and processed must be described complete with frequencies of monitoring and means of verifying the controls are effective.
 - b. Procedures shall be developed and documented to assure SPF poultry or poultry products are not commingled with non-SPF poultry. E.g. chiller segregation procedures, line separations, sequencing, etc.
 - c. Procedures shall be documented to account for poultry or poultry products excluded from the SPF program.
3. Shipment
 - a. Procedures for the control of SPF poultry or poultry products during shipment will be documented.
 - b. Controls will assure that SPF poultry or poultry products are positively identified and segregated from non-SPF poultry or poultry products at any stage of shipping
 - c. Procedures shall be documented for conducting necessary inspections, tests and record verifications to assure poultry or poultry products comply with program requirements
4. Records
 - a. The supplier shall document procedures for assuring all SPF program requirements are met prior to transfer of ownership.
 - b. Procedures for documenting the results of inspections and tests shall be developed and documented.
 - c. Records demonstrating compliance with SPF program shall be maintained. Records may be electronic or hard copy.
 - d. Records shall be maintained for 1 year after the close of the fiscal/calendar year in which they were created.
 - e. Records must be stored in a manner so as to prevent loss, damage or alteration.
 - f. Records must be made readily available to auditors.
5. Internal Audits
 - a. An internal assessment of the performance of the operation will be conducted for every phase of the process periodically.
 - b. The results of internal audits will be documented.

IV. Requesting Service

Any interested person may apply for service under this program. To request certification, suppliers must submit a cover letter requesting an SPF audit, along with a complete copy of the supplier's SPFC program manual for their operation that addresses items A-D in III. Program Requirements, to the National Supervisor, Poultry, USDA-AMS Poultry Programs, Grading Branch, 14th & Independence Avenue SW, Room 3935-S, Stop 0258, Washington DC, 20250.

To expedite service, suppliers should include the following information with their program manual:

1. A copy of the most recent internal audit report. All programs are to complete a satisfactory internal audit and record the findings before contacting USDA for auditing services.
2. A copy of the minutes of the most recent management review meeting if the program has been in operation for a year or more.
3. Completed examples of all verification forms used in the program. These examples should be taken from actual records.

National Office staff will review the program documentation for completeness to ensure that each element of the program requirements has been appropriately addressed. If the program documentation is adequate, the request and documentation will be forwarded to the assigned auditor, who will make arrangements for an on-site pre-production validation assessment.

A. Validation Assessment

After the program documentation is reviewed and approved a validation assessment will be performed. This in-depth analysis will validate the facility(s) processes, procedures and record keeping in regards to their SFP program documentation. The processes and record keeping validated during the assessment shall be adequate to assure that only product eligible for this program is produced, processed and certified. Minor adjustments for unsatisfactory procedures or record keeping must be made prior to the end of the assessment. Any necessary corrections not completed prior to the end of the analysis will require an additional validation assessment. Upon satisfactory completion of the validation assessment, the National Supervisor, Poultry shall be notified. The facility(s) will then be placed on the listing of approved systems/suppliers.

V. Audits

After completion of the validation assessment, the approved facilities will be eligible for SPF certification. To assure continued program compliance, AMS auditors will travel to each appropriate location and conduct a detailed audit of the program.

SPF audits will be performed on a quarterly basis. At each location, the auditor will:

1. Interview management personnel and employees with specific responsibilities relative to the program to verify their knowledge of program requirements, their role in the system, and the roles and responsibilities of other persons involved in the system.
2. Observe operations in process to ensure compliance with the supplier's program manual and verify adequacy of procedures.
3. Review written procedures and supporting documentation.
4. Establish positive traceability of poultry and poultry products on hand to their origin.

5. Conduct reviews of suppliers supporting businesses such as consulting veterinarians, feed suppliers, rendering facilities and sheep health product suppliers as deemed necessary by the auditor.

If indications that all audit requirements are satisfactorily met on two (2) consecutive audits, the time period between audits will be extended to six (6) months. On subsequent audits, any single item not found to be fully satisfactory would require the facility to revert back to quarterly audits. Any audit item found to be unsatisfactory would result in termination of the certification eligibility.

VI. Audit Reports

Upon completion of the audit, the auditor will prepare a detailed report in memorandum form of the audit findings, observations, and recommendations and submit to the National Supervisor, Poultry. The report will include, at a minimum:

1. Organizational structure of the business
2. Scope of the operation
3. Product control procedures
4. Traceability procedures
5. Training methods used
6. Involvement of other parties (veterinarians, feed suppliers, etc.)
7. Recommendation

Auditors will use the criteria below in describing the audit results:

- Satisfactory
- Satisfactory – Needs Improvement
- Unsatisfactory

Auditors will identify any significant findings of nonconformance in the audit report as either “Satisfactory- Needs Improvement” or “Unsatisfactory”.

Satisfactory is defined as not needing any improvement to the process or record keeping being evaluated.

Satisfactory – Needs Improvement is defined as a minor nonconformance that, although it needs to be corrected in a timely manner, does not compromise the integrity of the program.

Unsatisfactory is defined as a major nonconformance that compromises the integrity of the program to the extent that program approval is denied, revoked, or delayed until corrective action is completed. An “Unsatisfactory” item could result from items identified as “Satisfactory – Needs Improvement” on a previous audit that have not been corrected.

Results of the audit will be discussed with the supplier at the conclusion of the audit.

VII. Certification

With continued compliance in the SPF program, eligible product may be certified by FSIS inspectors on official export certificates when requested by the supplier. A complete listing of approved systems/suppliers will be available on the AMS Internet web site at <http://www.ams.usda.gov/poultry/grading/SPFC.htm>. Plant management must notify the FSIS Inspector-in-Charge of the request for certification. The request must contain the following information:

1. Product name
2. Lot number
3. Production date
4. Size of lot produced
5. Size of lot to be certified
6. Grower identification

The FSIS Inspector-in-Charge will provide the proper certification for the eligible product on the export certificate. The following statement is to be used:

Poultry and poultry products covered by this certificate have not been fed sheep protein, sheep fats, or sheep by-products.

Eligibility for the use of the statement remains until the completion of the next official audit. However, the National Supervisor, Poultry, may rescind this eligibility at any time for any of the following reasons:

1. Failure to adequately address any program documentation requirement.
2. Failure to demonstrate capability to meet any program requirement during the onsite audits.
3. Failure to provide access to the supplier's facility and records within the scope of the requested program.
4. Presenting false or misleading information to any AMS or FSIS official at any point in the review, audit or certification process.
5. Evidence of administration of any sheep protein, sheep fats, or by-products to poultry within the scope of the requested approval.
6. Evidence during the audit that indicates non-SPF product was shipped as SPF certified product.

VIII. Appeals

Suppliers have the right to appeal any adverse audit findings or decisions by the auditor or National Supervisor, Poultry. Appeals must be submitted in writing to the Chief, Grading Branch, Washington, D.C., within 30 days of the date of the official report rendering the findings or decision. Requests for appeals must include:

1. The basis for the appeal and,
2. The requested alternative decision or actions.

The Chief, Grading Branch will review the appeal and notify the supplier of the final decision within 30 days of receipt of the request. Any suspensions of certifications will remain in effect pending the outcome of the appeal.

IX. Fees for Service

The cost of program manual reviews and onsite audits, including auditing and travel time, per diem and related expenses are the responsibility of the party requesting the service. Expenses will be based on the current rates published in the Federal Register.